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Honorable Representatives
Montana House of Representatives
PO Box 200400
Helena, MT 59620-0400

Dear Sir(s) and Madame(s)

I am writing you to express my opposition to SB 432, which would mandate the use of biodiesel in Montana. I am a Montana resident and currently have thirteen trucks operating across the state.

First there are the economic considerations. There is insufficient data on the impact that low percentage blends of biodiesel have upon fuel economy. Currently, biodiesel is more expensive to produce than petroleum-based diesel.

High percentage biodiesel blends can cause a variety of engine performance problems, including filter plugging, injector coking, piston ring sticking and breaking, elastomer seal swelling and hardening/cracking, and severe engine lubricant degradation. Additional testing is needed to determine whether these operational issues are present at low percentage blends used over an extended period of time. The Engine Manufacturers Association recommends that the conditions of seals, hoses, gaskets, and wire coatings should be monitored regularly when biodiesel fuels are used. Older trucks (pre-1994) may require upgraded components to ensure trouble-free operation.

Engine manufacturers warrant their engines for "materials and workmanship." An engine company will cover a fault with an engine part or with engine operation within the prescribed warranty period, if the fault is due to an error in manufacturing or assembly. Typically, an engine company will define what fuel the engine was designed for and will recommend the use of that fuel to their customers in their owners' manuals. Engine companies do not, however, warranty fuel. Engine problems arising directly from fuel use (and not a fault in materials and workmanship) are the responsibility of the fuel supplier and not the engine manufacturer.

Biodiesel acts as a solvent, which can remove deposits from fuel tanks and cause filter plugging. *As a result, more frequent fuel filter changes are anticipated, which will increase maintenance costs.* Switching between No. 2 diesel and biodiesel blends may cause a fuel filter to become clogged. **Additional research** is needed to determine whether low percentage blends of biodiesel will act as a solvent and necessitate unexpected fuel filter changes. *Anti-gelling products, heating systems for fuel tanks and blending with No. 1 diesel fuel have been used to prevent gelling, but each of these options adds to operating costs.*

Petroleum diesel fuels, however, have both pour points and cloud points (the temperature at which a cloud or haze of wax crystals first appears and separates from the fuel) well within the range of cold temperatures

at which they might be used. Biodiesel has the same issues, but at even higher temperatures. The cloud point for biodiesel will vary based on the type of feedstock used.

Biodiesel mandates result in higher diesel prices for consumers and last winter, the trucking industry experienced problems in Minnesota caused by poor quality biodiesel. In fact, the Minnesota mandate was suspended twice as a result of poor quality biodiesel and more recently, the National Biodiesel Board, in conjunction with the National Renewable Energy Laboratory, conducted a survey of 40 biodiesel producers and found that one-third of the samples taken did not meet the American Society of Testing Materials (ASTM) quality specifications. I think that more research is necessary before we look at forcing us to use this fuel. Lastly if there is to be a mandate it should come in the form of a National biodiesel standard so that all trucking companies no matter what state they are located in play by the same rules.

I can tell you that if I have the opportunity to fuel up outside of the state of Montana I will do just that. I will refuse to use biodiesel until it is proven to be the best fuel available and then it will be my decision not the states.

We know from experience. We have already replaced two injectors on one truck. Over \$3000 for engine repairs to help save the air, pay more for fuel and the cost of adding additives ourselves (which probably negates the clean air). There are 6 injectors on each truck. Does the state of Montana want to pay \$114,000 to replace the other 76 injectors on our trucks by making it a law to use biodiesels? Look at the bigger companies such as Watkins-Shephard, Palmer, etc and how many trucks they have. What would the state of Montana do with a class action law suit for the replacement of 6,000 diesel engines at \$25,000 per engine? Think about it.

Please vote no on SB 432.

Sincerely,

Pam Nelson
Merchants Moving & Storage Inc
Hamilton, MT 59840